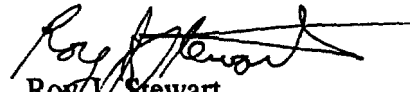


searching for, reviewing and duplicating records sought pursuant to the Freedom of Information Act. The search and review costs associated with FOIA 97-155 amount to \$47.89, the fee for one hour of search and review time by a GS-15 Attorney-Adviser, pursuant to Section 0.467(a) of the Commission's Rules. The charge for duplication of the records being furnished to you is \$1.53 (9 pages @ 17 cents per page, as set forth in Section 0.456(c)(2) of the Commission's Rules). Accordingly, the total charge for processing your FOIA request and furnishing copies of Commission records is \$49.42. The Financial Management Division, Office of the Managing Director, Federal Communications Commission, will send you a bill in that amount in the near future. Payment by your remittance made payable to the Federal Communications Commission is due 30 days after receipt of the bill.

I trust the foregoing is responsive to your request, as revised.

Sincerely,

  
Roy J. Stewart  
Chief, Mass Media Bureau

Enclosures

## RADIO STATION INSPECTION REPORT

### WXTM Main Studio - Location

WXTM main studio is located at the existing studio of radio station WVOS AM/FM on Old Route 17 in Ferndale NY. However, there were no signs on the outside of the building to indicate to the public that it is the studio for WXTM (only a WVOS AM/FM sign). No telephone line is set aside for WXTM calls, nor is any line answered as WXTM.

### WXTM Main Studio - Staff

The main studio is staffed by General Manager Eugene Blabey and Public Service Director Carol Montana. Eugene Blabey is also the owner of WVOS AM/FM. Carol Montana is also the Business Manager of WVOS AM/FM. She stated that she spends about 25% of her time for WXTM and 75% for WVOS.

### WXTM Main Studio - Programming

The main studio for WXTM is a former production room of WVOS leased by Wesley Weis. Blabey states, however, that although it is capable of being used, it has never actually provided programming to the WXTM transmitter. Indeed, he indicated that in order to do so would require going to the transmitter site and effecting a change of cabling at the patch panel to connect the transmitter to the studio.

Programming is 100 percent from Jukebox Radio in Dumont NJ, including music, advertising, news, and callsign identification. A telephone line is used deliver the audio to the transmitter.

### WXTM Main Studio - Transmitter Control

There is no remote equipment installed at the main studio to control the WXTM transmitter or to read transmitter operating parameters. The transmitter is controlled full time by personnel of Jukebox Radio in Dumont NJ by telephone line.

### WXTM - LMA

There is no Local Marketing Agreement between WXTM and Jukebox Radio. Instead, WXTM entered into a network agreement with Jukebox Radio. A copy of the network agreement, signed by Gerald Turro and Wesley Weis was provided to the inspecting engineer.

### Jukebox Radio - STL WMG499

The transmitting antenna for the STL was observed to be in a southerly direction, within a few degrees of the direction of the translator W276AQ in Fort Lee NJ. The STL transmitter was active at the time of inspection, however, the translator at Fort Lee was determined to receiving programming off the air from the translator at Pomona NY operating on 94.3 MHz. The Pomona NY translator was determined to be receiving programming from WXTM on 99.7 MHz. Although the quality of the audio at Pomona and Fort Lee was degraded due to splatter from WBAI (in

New York NY on 99.5 MHz), Turro stated that the condition was due to the WXTM transmitter operating at reduced power due to a recent lightning strike. The inspecting engineer had observed that the operating power at WXTM was reduced.

Jukebox Radio - Control of WXTM

Remote control equipment was observed at Jukebox Radio that was stated to be for the control of WXTM. Gerald Turro, by telephone, stated that he is Chief operator for WXTM, however, he does not receive any salary for that position.

WXTM, Monticello NY, and Jukebox Radio, Dumont NJ inspected on April 13 and 14, 1995 by engineer Serge Loginow Jr.

Fort Lee NJ Translator - Second Monitoring

The Fort Lee translator was monitored again on May 15, 1995. Audio quality was considered very high, with no detectable splatter from WBAI. While on the top floor of the apartment building housing the Fort Lee translator, the inspecting engineer transmitted a low level signal on the frequencies of 99.7 MHz, 94.3 MHz and 951.0 MHz while listening to the translator signal on 103.1 MHz. The translator output was blocked only with the transmission of a test signal on the frequency of the STL, 951.0 MHz.

## Network Affiliation Agreement

Bergen County Community Broadcast Foundation (Network) and Monticello Mountaintop Broadcasting Inc. (MMBI) enter into this network affiliation agreement on OCT. 17, 1994. This agreement will commence at 12:01 AM, Oct. 1, 1994 and terminate at 12:01 AM, Oct. 1, 2004.

Network will provide MMBI with twenty-four hours of programming on a seven day basis, 365 days a year. Network will also provide all local station identifications (Legal ID's), public affairs programming, and Emergency Broadcast System tests.

Network agrees to indemnify MMBI and hold it harmless from any and all fines, surcharges, forfeitures, levies, and any other monetary damages imposed by the F.C.C.

Network is responsible for delivery of usable audio programming to MMBI via satellite, phone lines or other suitable means. Network is responsible for all costs incurred for delivering Network audio. Network will abide by all applicable FCC rules concerning program content.

Network will compensate MMBI for carrying all network programming on a twenty-four hour basis, as follows:

Year One - \$8,575.00 per month

Year Two - \$8,975.00 per month

Year Three - the first six months - \$9,140.00 per month

Year Three - the second six months - \$5,400.00 per month

Year Four - \$5,400.00 per month

Year Five - \$4,675.00 per month

Remaining 5 years - Year 5 plus 5% or the CPI, whichever is greater.

All payments are due and payable, in advance, on the first of the month. MMBI will provide Network with a ten day grace period after the first of the month.

The monthly compensation to MMBI will be reduced by \$3,600.00 per month after the first thirty months of network affiliation.

Both parties agree to abide by all applicable FCC rules and regulations.

MMBI agrees to allow translator W276AQ to rebroadcast 99.7 FM, Monticello New York.

This agreement will be binding to Network, its successors, assigns and/or transferees.

IN WITNESS WHEREOF, the parties have hereunto set their hands and seals this 17<sup>th</sup> day of OCTOBER, 19 94.

Signed, sealed and delivered  
in the presence of

Kathleen Kahyaoglu

Gerald Turro for Network

Wesley Wells for MMBI

STATE OF NEW JERSEY }  
COUNTY OF BERGEN } SS.:

BE IT REMEMBERED that on this 17 day  
of OCTOBER, 19 94 before me, the subscriber,  
a Notary Public of New Jersey, personally appeared  
Gerald Turro, Wesley Wells, who, I am satisfied,  
are the person(s) named in and who executed the within  
Instrument, and thereupon HAVE acknowledged that they  
signed the same as \_\_\_\_\_ act and deed, for the uses and purposes  
therein expressed.

Kathleen Kahyaoglu  
Notary Public of N.J.

KATHLEEN KAHYAOGLU  
NOTARY PUBLIC OF NEW JERSEY  
MY COMMISSION EXPIRES SEPT. 15, 1998

Fax to

Jeff Young  
CIB, Enforcement  
for

Steve Barone  
MMB, Enforcement

#202-418-2813

Inspection Report for  
WXTM Monticello NY  
and W276AQ W232AL  
translators

**Not For Public Inspection**

August 9, 1995

**CONFIDENTIAL**

### **STATEMENT**

Under penalty of perjury, we the undersigned make the following statement:

My name is Vincent D. Luna, employed by Jukebox Radio, Bergen County Broadcast Foundation from February 28, 1993 until May, 1995.

There were times when W276AQ, Fort Lee received audio from Dumont via:

1. Microwave Line (microwave dish is installed on top of building next to 75 Second Street - This building is occupied by Mikab - a company owned by Wes Weis.
2. In the event that the microwave link failed - a back-up phone line would automatically engage so no interruption of the audio channel could occur. When the system ran in this mode (telephone line), the audio quality heard on 103.1 FM would be slightly diminished.

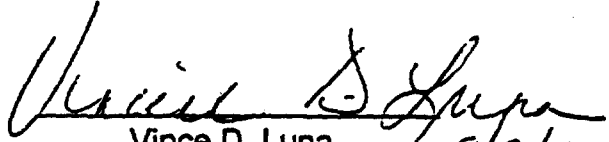
On a date in early April, I was informed that an FCC inspector was at the Monticello transmitter site. The inspector wanted to see if the Monticello unit could be shut off by remote control from Dumont. Gerry Turro was away at the NAB conference in Las Vegas and was contacted by General Manager, Jay Epstein. Gerry Turro was made aware of the the situation. (Note person A and B, are two employees). I was instructed by Gerry Turro to relieve the staff announcer (A). He (Gerry) told me that he wanted (A) to stand next to the remote control for Monticello while at the same time he wanted person (B) to stand next to the remote control for Fort Lee. He also instructed me to operate the Master Audio Control in the following manner: Gerry told me that he would give me a 3-2-1 countdown - upon 1, I was to drop the audio, Person (A) was to shut down Monticello and Person (B) was to shut off Fort Lee. Turro said that this had to be done to prove that by shutting off Monticello, there would be no way for 94.3 to receive audio and consequently 103.1 should also not be able to receive audio from 94.3 FM. Gerry's attempt at deception failed however

because the remote control for Monticello did not operate and did not shut off the transmitter. The resulting scenario witnessed by the FCC Inspector would show that the audio was indeed silenced but the transmitter was still at full power. There should have been audio heard at all 3 sites - because shutting down the Monticello transmitter does not normally shut down the audio feed.

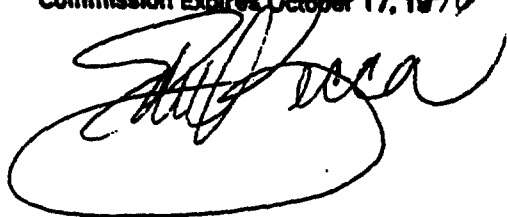
Person (B) and I were both told by Jay Epstein that our jobs were on the line if we didn't do the above. He said that the station could lose its license and we'd both be out of jobs. The control unit - TC-8, is located under the reel to reel in the studio behind the announcer position. This unit is the remote for the Fort Lee translator. When Light 1 is lit, audio is fed to Fort Lee from Dumont via a microwave dish. The system would divert to a back-up phone line if the dish failed to operate.

When light 5 was lit, I was told that the Fort Lee translator received audio from 94.3. 94.3 received its audio from 99.7 and 99.7 received its audio path from the Dumont studio.

To the best of my knowledge, the system ran in mode 1 most of the time, except at the time of the FCC inspections. When I requested from Gerry an instruction sheet for the Fort Lee remote control, he consistently avoided the issue. All other operations in the radio station had accompanying operating procedure sheets.

  
Vince D. Luna 8/9/95

EDITH M. ZECCA  
Notary Public, State of New York  
No. 41-4843323  
Qualified in Queens County  
Commission Expires October 17, 1996





**Not For Public Inspection**

**CONFIDENTIAL**

August 10, 1995

95080.154

**STATEMENT**

*WJUX - FM*

Under penalty of perjury, I the undersigned make the following statement:

My name is William Gaghan, employed by Jukebox Radio, Bergen County Broadcast Foundation as Music Director, then Program Director and Afternoon Disc Jockey from March 1, 1993 until May, 1995.

Most of the time, during my employment at Jukebox Radio, programming was sent directly from Dumont, NJ, studios over a microwave dish, located on the building next to 75 Second Street ( Wes Weiss building). It was also set up that if Fort Lee lost the microwave signal then it would come over a back-up telephone line. I was told this by Jerry Turro. In fact a couple of times, we were off the air in Monticello, but were still on the air in Fort Lee.

In the main air studio underneath the reel to reel machine and processing equipment, was a panel that consisted of eight lights (TC-8 Remote) operated by a three button system control which was "channel, raise, lower".

*TC-8 Remote*

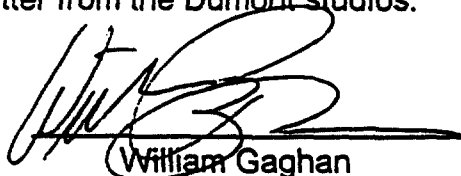
#1 ●	#5 ●
#2 ●	#6 ●
#3 ●	#7 ●
#4 ●	#8 ●

When light #1 was lit, this sent the signal to the Fort Lee translator over microwave or telephone line.

I was told by Gerry Turro if the FCC came around, I was to switch it over to the #5 light this way the signal for Fort Lee was coming from Monticello to Pomona then to Fort Lee.

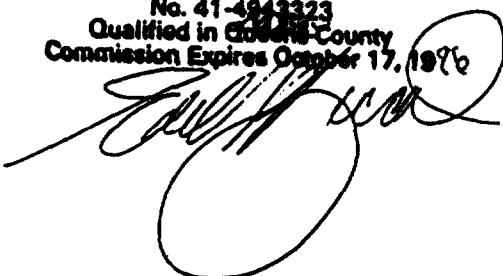
During my employment , the few times we were off the air in Monticello we would still be on the air in Fort Lee because the light would be in the number #1 position.

I recall one specific episode in April of this year, where I had to partake in a situation that involved me and two other employees. We had received word that an FCC inspector was coming from Monticello (WJUX). Apparently, the inspector wanted to see if the Monticello unit could be shut off by remote control from our Dumont location. Jay Epstein, who is the general manager, told all three of us that our jobs would be in jeopardy if we did not follow Gerry's instructions. Gerry, at that time, was in Las Vegas at the NAB convention. While one employee had to take the Monticello transmitter off the air, I had to hold the switch that controlled the signal being sent to Monticello, while another employee had to turn the master gain on the console. Thus, making it look like we had control of the Monticello transmitter from the Dumont studios.



William Gaghan

EDITH M. ZECCA  
Notary Public, State of New York  
No. 41-4843323  
Qualified in ~~Columbia~~ County  
Commission Expires October 17, 1976



**ATTACHMENT C**

**From:** Serge Loginow  
**To:** SLINN,SBARONE  
**Date:** 8/1/95 12:09pm  
**Subject:** Gerald Turro Update

**Gerald Turro Update**

On site monitoring in area of Jukebox Radio studio in Dumont NJ on July 31, 1995. The STL (WMG499) was not observed to be in operation on 951.00 MHz, or any frequency near 951.00 MHz.

The audio quality of the Fort Lee NJ translator signal, however, indicated that the input signal was NOT off air from the Pomona NY translator on 94.3 MHz as licensee Gerald Turro claims, but rather from alternate means, presumably via telephone lines. (The audio quality of Fort Lee via off air means had been observed during April 1995 when WXTM Monticello NY and Jukebox Radio was inspected.)

**ATTACHMENT D**

**From:** Serge Loginow Jr  
**To:** fobmail:oadal5:PCUNIX:CAD:CONV:B4.B4:SBARONE  
**Date:** 8/4/95 9:46am  
**Subject:** Gerald Turro Update # 2

On site monitoring in area of the Fort Lee NJ translator on August 2, 1995. The audio quality appeared to be very high. It was particularly free of sideband splatter from adjacent FM stations as was observed previously. Telephoned Turro and asked for an inspection of the Fort Lee translator. He replied no problem, he can be there in about twenty minutes. Turro arrived and demonstrated off air reception of the Pomona NY translator (94.3 MHz) by deactivating the receiver and observing the loss of audio output from the translator. He then offered to make a similar demonstration at the Pomona NY translator with the engineer. Turro and Loginow went to ~~Pomona NY~~. The output of the translator there was deactivated and again the Fort Lee translator was observed to lose audio output. Turro had installed additional filters at Pomona to greatly improve the reception of WJUX Monticello NY.

It appears that Turro is now able to provide a consistent high quality audio signal off air from the Pomona NY translator at the Fort Lee NJ location.

Furthermore, while at Fort Lee, Turro demonstrated the ability to receive moderately good audio directly from WJUX Monticello (99.7 MHz). Again, he was using filters similar to those he installed at Pomona NY. Turro said he plans to fine tune the equipment to further improve the Monticello signal quality and then permanently connect it as part of the translator station.

Serge

## **CERTIFICATE OF SERVICE**

I, Barbara Frank, a secretary in the law offices of Koteen & Naftalin, L.L.P. , hereby certify that true copies of the foregoing "GERARD A. TURRO'S REQUEST TO THE MASS MEDIA BUREAU FOR ADMISSIONS OF FACT AND GENUINENESS OF DOCUMENTS" have been served upon the following by first-class United States mail, postage prepaid, this 8th day of August 1997:

- \* The Honorable Arthur I. Steinberg  
Administrative Law Judge  
Federal Communications Commission  
2000 L Street, N.W., Room 228  
Washington, D.C. 20554
- \* Alan Aronowitz, Esq.  
Hearing Branch  
Enforcement Division  
Federal Communications Commission  
2025 M Street, N.W., Room 7212  
Washington, D.C. 20554
- \* Stephen Barone  
Complaints and Investigations Branch  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 8210  
Washington, D.C. 20554

- \* Suzan B. Friedman  
Federal Communications Commission  
2025 M Street, N.W., Room 8210  
Washington, D.C. 20554

James P. Riley, Esq.  
Fletcher, Heald & Hildreth, P.L.C.  
1300 North 17th Street  
11th Floor  
Rosslyn, VA 22209

Roy R. Russo, Esq.  
Richard A. Helmick, Esq.  
Cohn and Marks  
1333 New Hampshire Avenue  
Suite 600  
Washington, D.C. 20036

/s/ Barbara Frank  
Barbara Frank

\* By Hand Delivery

**TURRO EXHIBIT NO. 24**



*Turro Hearing Black  
"8/13/97 Bureau Third  
Supp. Interrogatory Answers"*

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In re )  
)  
GERARD A. TURRO )  
)  
For Renewal of License )  
for FM Translator Stations )  
)  
)  
W276AQ(FM), Fort Lee, NJ, and )  
W232AL(FM), Pomona, NY )  
)  
MONTICELLO MOUNTAINTOP )  
BROADCASTING, INC. )  
)  
Order to Show Cause Why the Construction )  
Permit for FM Radio Station WJUX(FM). )  
Monticello, NY, Should Not Be Revoked )  
  
To: Gerard A. Turro

MM Docket No. 97-122

File Nos. BRFT-970129YC  
BRFT-970129YD

Case No.	Official Exhibit No.
97-122	T-24
Disposition:	Identified <input checked="" type="checkbox"/>
Rejected <input type="checkbox"/>	Received <input checked="" type="checkbox"/>
IN THE MATTER OF: Turro	
11-24-97	Shonard
Date:	Witness: Reporter:
No. Pages:	

**MASS MEDIA BUREAU'S THIRD SUPPLEMENTAL  
ANSWERS TO INTERROGATORIES OF GERARD A. TURRO**

On May 23, 1997, Gerard A. Turro ("Turro"), by his attorneys, submitted interrogatories to the Mass Media Bureau ("Bureau") and the Bureau filed its answers on June 9, 1997. On June 23, 1997, the Bureau filed Supplemental Answers to Interrogatories. On August 5, 1997, the Bureau filed Second Supplemental Answers to Interrogatories. The Bureau, pursuant to its continuing obligation to update its answers to such interrogatories as appropriate, submits the following Third Supplemental Answers to Turro's interrogatories.

Interrogatories

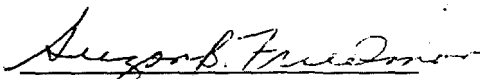
Interrogatory No. 36: Identify all witnesses who may offer testimony you intend to rely on in any portion of the Proceeding for any purpose.

Supplemental Answer: Jay Epstein was the general manager of Jukebox Radio, Inc. from January, 1995, until August, 1996. He supplied the Bureau with a signed statement. The Bureau does not intend to use this statement or to call Mr. Epstein as a witness in any portion of the Proceeding for any purpose.

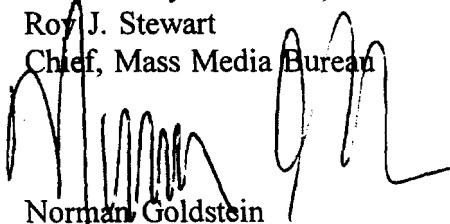
Interrogatory No. 38: Describe and identify all documents relating to your responses to Interrogatory Nos. 36 and 37, or in the alternative, make them available for copying.

Supplemental Answer: Jay Epstein prepared a signed statement. In the interests of fully disclosing all information received during the course of this proceeding, the Bureau is hereby providing a copy of such statement.

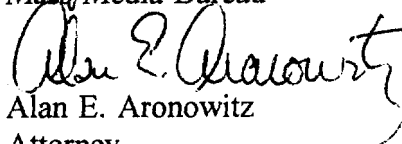
I, Suzan B. Friedman, hereby swear under penalty of perjury that the forgoing answers are true and correct to the best of my knowledge and belief.

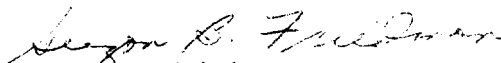
  
Suzan B. Friedman

Respectfully submitted,  
Roy J. Stewart  
Chief, Mass Media Bureau



Norman Goldstein  
Chief, Complaints & Political Programming Branch  
Enforcement Division  
Mass Media Bureau

  
Alan E. Aronowitz  
Attorney  
Mass Media Bureau

  
Suzan B. Friedman  
Attorney  
Mass Media Bureau

Federal Communications Commission  
2025 M Street, N.W., Suite 8210  
Washington, D.C. 20554  
(202) 418-1430

August 13, 1997

97080037

**STATEMENT OF JAY EPSTEIN**

WJUX - FM

1. My name is Jay Epstein. I currently reside at 2762 Plaimor Avenue, Palm Springs, California, 92262.

2. I was the General Manager of Jukebox Radio from January, 1995, until August, 1996, when my employment was terminated by Gerry Turro, owner of Jukebox Radio.

3. During my employment with the Jukebox Radio network, I worked with Mr. Turro on a daily basis. I was primarily responsible for advertising sales, marketing and promotion for the Jukebox Radio network.

4. I understood that because Gerry Turro is a radio engineer, he had the primary understanding and knowledge of Jukebox Radio's technical facilities. Other than Mr. Turro, I understood that William Gaghan, Jukebox Radio's Program Director, and Vincent Luna, Jukebox Radio's Production Director, were familiar with and operated Jukebox Radio's technical operation.

5. I recall that during the Spring of 1995, an FCC inspector came to the Dumont, New Jersey, studios of Jukebox Radio. We were aware that the FCC inspector was coming, and, although I met him when he arrived in Dumont, I do not recall the inspector's name.

6. I recall that the FCC inspector was interested in testing certain technical equipment. Because Mr. Turro was not at the station during the inspection (he was attending the NAB convention in Las Vegas) and because I was unfamiliar with Jukebox Radio's technical operation, I got Mr. Turro on the telephone and he spoke to the FCC inspector. I also knew that Mr. Luna and Mr. Gaghan were familiar with Jukebox Radio's technical operation. Mr. Turro instructed them to operate the equipment at the Dumont studios during the FCC inspection. Other than meeting the inspector, I did not participate in the inspection or testing conducted by the FCC inspector.

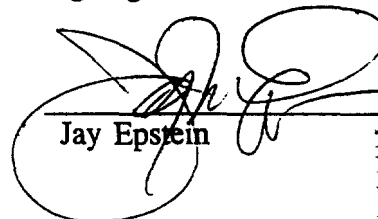
7. I have reviewed the August 9, 1995, statement of Vincent Luna, and the August 10, 1995, statement of William Gaghan. Mr. Turro directed one or both of them to operate the equipment at the Dumont studios during the FCC inspection. However, I do not specifically recall stating that Mr. Luna's or Mr. Gaghan's jobs were in jeopardy.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Date

8/1/97

Jay Epstein



MEMPHIS  
SOUTHERN  
INVESTMENT

AUG 4 2 41 PM '97

RECEIVED

CERTIFICATE OF SERVICE

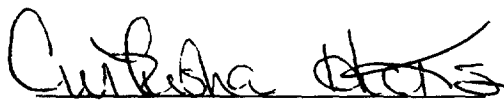
CurTrisha Hicks, a secretary in the Enforcement Division, Mass Media Bureau, certifies that she has on this 13th day of August, 1997, sent by U.S. mail, U.S. Government frank, copies of the foregoing "Mass Media Bureau's Third Supplemental Answers to Interrogatories of Gerrard A. Turro to:

Administrative Law Judge Arthur I. Steinberg  
Federal Communications Commission  
2000 L Street, N.W., Suite 228  
Washington, D.C. 20554

Alan Y. Naftalin, Esq.  
Charles R. Naftalin, Esq.  
Koteen & Naftalin  
1150 Connecticut Ave., N.W.  
Washington, D.C. 20036

James P. Riley, Esq.  
Fletcher, Heald and Hildreth, P.L.C.  
1300 North 17th Street  
11th Floor  
Rosslyn, VA 22209

Roy R. Russo, Esq.  
Richard A. Helmick, Esq.  
Cohn and Marks  
1333 New Hampshire Ave., Suite 600  
Washington, D.C. 20036

  
CurTrisha Hicks

**TURRO EXHIBIT NO. 25**

*Turro  
Blanc*

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In re ) ) GERARD A. TURRO ) ) For Renewal of License ) for FM Translator Stations ) ) ) W276AQ(FM), Fort Lee, NJ, and ) W232AL(FM), Pomona, NY ) ) MONTICELLO MOUNTAINTOP ) BROADCASTING, INC. ) ) Order to Show Cause Why the Construction ) Permit for FM Radio Station WJUX(FM), ) Monticello, NY, Should Not Be Revoked )  To: Gerard A. Turro	MM Docket No. 97-122  File Nos. BRFT-970129YC BRFT-970129YD  Case No. 97-122      Official Exhibit No. T-25 Disposition: Identified <input checked="" type="checkbox"/> Rejected <input type="checkbox"/> Received <input checked="" type="checkbox"/> IN THE MATTER OF: 11-24-97      Shover Date:      Witness:      Reporter:  No. Pages: _____
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**ANSWERS OF SERGE LOGINOW, JR. AND THE MASS  
MEDIA BUREAU TO INTERROGATORIES  
OF GERARD A. TURRO**

On August 8, 1997, Gerard A. Turro ("Turro") by his attorneys, submitted interrogatories to Serge Loginow, Jr. ("Loginow"), an employee of the Commission's Compliance and Information Bureau ("CIB") and the Mass Media Bureau ("Bureau").<sup>1</sup>

Pursuant to Section 1.311 of the Commission's Rules, the following answers are provided.

---

<sup>1</sup> Section 1.44 of the Commission's Rules generally requires separate pleadings for different requests for action by Commission personnel. Although Turro's interrogatories are directed to both Loginow and the Bureau, these answers are responded to by Loginow based upon his personal knowledge. The Bureau's knowledge and information regarding these matters are based solely on the information provided to it by Loginow.

### Answers

Interrogatory 1: I made the observations described in interrogatory 31 with respect to the inspections in April and May of 1995. I did not personally determine whether there were specific violations of Commission rules. Rather, I just made the observations outlined herein and reported them to Bureau.

Interrogatory 2: I prepared typewritten notes, which have been disclosed by the Bureau, from handwritten notes. After I prepared the typewritten notes, I discarded the handwritten notes.

Interrogatory 3: I have spoken to Mass Media Bureau employees Stephen Barone and Alan Aronowitz about the events relating to my response to interrogatory 1.

Interrogatory 4: Gerard A. Turro.

Interrogatory 5: There is no such allegation.

Interrogatory 6: See interrogatory 5.

Interrogatory 7: See interrogatory 5.

Interrogatory 8: See interrogatory 5.

Interrogatory 9: The only technical analyzes (sic) I am aware of was prepared by Cohen, Dippell and Everist, P.C., which was furnished as an attachment to the complaint filed by Universal Broadcasting of New York, Inc.

Interrogatory 10: See interrogatory 1.

Interrogatory 11: See interrogatory 2.

Interrogatory 12: See interrogatory 3.

Interrogatory 13: See interrogatory 4.



Interrogatory 14: See interrogatory 1.

Interrogatory 15: See interrogatory 2.

Interrogatory 16: See interrogatory 3.

Interrogatory 17: See interrogatory 4.

Interrogatory 18: See interrogatory 1.

Interrogatory 19: See interrogatory 2.

Interrogatory 20: See interrogatory 3.

Interrogatory 21: See interrogatory 4. In addition, Eugene Blabey and Carol Montana.

Interrogatory 22: See interrogatory 1.

Interrogatory 23: See interrogatory 2.

Interrogatory 24: See interrogatory 3.

Interrogatory 25: See interrogatory 4.

Interrogatory 26: See interrogatory 1.

Interrogatory 27: See interrogatory 2.

Interrogatory 28: See interrogatory 3.

Interrogatory 29: See interrogatory 4.

Interrogatory 30: I was the only person who conducted the investigations.

Interrogatory 31: April 13, 1995: Jeff Young, Investigations Branch, CIB, requested that I inspect WXTM at the written request of Norman Goldstein, Compliance and Investigations Branch, Mass Media Bureau. Sometime after 9 a.m. on April 13, 1995, I went to the address listed for the main studio of WXTM in Ferndale, New York. Although I was